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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE JUNIPER NETWORKS, INC.  
SECURITIES LITIGATION

THE NEW YORK CITY EMPLOYEES'  
RETIREMENT SYSTEM, et al.,

Plaintiffs,

v.

LISA C. BERRY,

Defendant

No. C06-04327-JW (PVT)

**LEAD PLAINTIFF'S  
SUPPLEMENTAL SUBMISSION IN  
SUPPORT OF MOTION FOR  
SANCTIONS AGAINST  
DEFENDANT ERNST & YOUNG**

No. C08-0246-JW (PVT)

BEFORE: Hon. Patricia V. Trumbull

LEAD PLAINTIFF'S SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION FOR  
SANCTIONS AGAINST DEFENDANT ERNST & YOUNG – CASE No. 06-04327-JW (PVT)

1 Pursuant to the Court's order dated January 28, 2010, Lead Plaintiff the New York City  
2 Pension Funds, makes this supplemental submission in support of the motion for sanctions against  
3 defendant Ernst & Young LLP ("EY"). Lead Plaintiff has selected eight documents from EY's  
4 November 2009 production that, if timely produced, would have led to multiple lines of  
5 questioning and/or discovery requests. A description of each document, the type of discovery  
6 sought, and the respective lines of questioning, are set forth in Schedule A attached hereto.

7 For the Court's convenience, copies of the documents referenced in Schedule A are  
8 attached to the accompanying Declaration of David C. Harrison.  
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14 Respectfully Submitted,

15 Dated: February 11, 2010

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17 LOWEY DANNENBERG COHEN & HART, P.C.

18 /s/

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